

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

**In re:**

**CASE NO.: 19-16607-amc  
CHAPTER 13**

**Kareem Samuel,  
Debtor.**

\_\_\_\_\_ /

**RESPONSE TO MOTION FOR ACCOUNTING DETERMINATION  
OF PRINCIPAL BALANCE, AND SANCTIONS**

**COMES NOW**, The Bank of New York Mellon FKA The Bank of New York, as Trustee for the certificate holders of the CWABS, Inc., Asset-Backed Certificates, Series 2006-18 C/o NewRez LLC d/b/a Shellpoint Mortgage Servicing (“Secured Creditor”), by and through the undersigned attorney, hereby files its Response to Motion for Accounting Determination of Principal Balance, and Sanctions (“Response”)(at Docket Entry No. 106), and in support thereof states as follows:

1. Admitted as to date of filing only.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part, denied in part. Admitted as to the character of the loan. Insufficient information to admit or deny balance of this averment, and therefore, it is denied.
7. Admitted that the number was printed on the bottom of the Notice of Payment Change.

8. Admitted that the number was printed on the bottom of the Notice of Payment Change.

9. Denied. Strict proof to the contrary required at trial.

10. Insufficient information to admit or deny this averment and therefore it is denied.

11. Admitted in part, denied in part. Admitted that present secured creditor has not filed a motion for relief in the instant case. Insufficient information to address the balance of this averment and therefore, it is denied.

12. Admitted only that Debtor was approved for a loan modification by the prior servicer prior to this transfer to Secured Creditor.

13. Insufficient information to admit or deny this averment, and therefore, it is denied.

14. Insufficient information to admit or deny this averment, and therefore, it is denied.

15. Insufficient information to admit or deny this averment, and therefore, it is denied.

16. This averment is a conclusion of law to which no response is required, and it is therefore it is denied.

17. Insufficient information to admit or deny this averment, and therefore, it is denied.

18. Insufficient information to admit or deny this averment, and therefore, it is denied.

19. Insufficient information to admit or deny this averment, and therefore, it is denied.

20. Denied. Strict proof to the contrary required at trial.

21. Denied. Strict proof to the contrary required at trial.

22. Denied. Strict proof to the contrary required at trial.

23. Insufficient information to admit or deny this averment, and therefore, it is denied.

24. Denied. By way of further answer, the loan at issue was transferred to Secured Creditor September 13, 2024. Strict proof to the contrary required at trial.

25. Denied. Strict proof to the contrary required at trial. By way of further answer, Secured Creditor reserves the right to supplement its Response to Motion for Accounting Determination of Principal Balance and Sanctions at any time prior to the hearing.

**WHEREFORE**, Movant respectfully requests that based on the foregoing, that this Honorable Court deny the Motion of Debtor in its entirety.

Respectfully submitted,

Robertson, Anschutz, Schneid, Crane  
& Partners, PLLC  
Attorneys for Secured Creditor  
13010 Morris Rd., Suite 450  
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Telephone: 470-321-7112

By: /s/Sherri R. Dicks  
Sherri R. Dicks, Esquire  
Email: sdicks@raslg.com  
Pennsylvania Bar No. 90600

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on January 20, 2025, I caused to be electronically filed the foregoing with the Clerk of Court via the CM/ECF system, and caused a true and correct copy to be served via CM/ECF and/or U.S. Mail, First Class Mail, postage prepaid to the following parties:

Kareem Samuel  
314 Lagrange Avenue  
Essington, PA 19029

and via electronic mail to:

MICHELLE LEE, ESQ.  
Dilworth Paxson  
1500 Market Street  
Suite 3500E  
Philadelphia, PA 19102

KENNETH E. WEST  
Office of the Chapter 13 Standing Trustee  
190 N. Independence Mall West  
Suite 701  
Philadelphia, PA 19106

FREDERIC J. BAKER  
Assistant United States Trustee  
Office of the U.S. Trustee  
Robert N.C. Nix Federal Building  
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